

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JING ZHANG, WEI FAN, MINGLIAN ZHANG, AND JUN)
ZHOU,)
)

Plaintiffs) 21-cv-01625 (GHW)(BCM)

v.)

XUEYUAN HAN, HANFOR HOLDINGS CO., LTD., HF)
HOLDINGS LIMITED., HANFOR CAPITAL)
MANAGEMENT CO., LTD., NUOYUAN)
CAPITALMANAGEMENT COMPANY LTD., GEORGE)
XU, JUNJUN FENG, WENNAN AO, BZ INDUSTRIAL)
(CHINA), BZ INDUSTRIAL (VIRGIN ISLANDS), BZ)
INDUSTRIAL (CAYMAN ISLANDS), HANFOR)
(CAYMAN) LIMITED, HFRE LLC, HF CAPITAL)
MANAGEMENT CAY INC., HF COSMOPOLITAN BETA)
L.P., HENGTAI SECURITIES CO., LTD., JOHN DOES 1-)
10, JANE DOES 1-10, AND ABC-XYZ CORP. 1-10,)
)
)
)
Defendants.)

**DECLARATION OF
JUNJUN FENG IN
OPPOSITION TO
PLAINTIFFS'
APPLICATION FOR AN
ATTACHMENT**

Junjun Feng hereby declares pursuant to 28 U.S.C. § 1746:

1. I am a defendant in this action. I submit this declaration in opposition to the plaintiffs' order to show cause seeking an attachment against the defendants. This declaration is based on my personal knowledge.

2. I do not have (and have never had) a direct or indirect ownership interest in Hanfor Holdings Co., Ltd., HF Holdings Limited, Hanfor Capital Management Co., Ltd., Nuoyuan Capital Management Company Ltd., BZ Industrial (CHINA), BZ Industrial (Virgin Islands), BZ Industrial (Cayman Islands), Hanfor (Cayman) Limited, HFRE LLC, HF Capital Management Cay Inc., HF Cosmopolitan Beta L.P., or Hengtai Securities Co., Ltd. (collectively, the "Corporate Defendants").

3. I am not (and have never been) a director, manager or general partner of any of the Corporate Defendants.

4. I am not (and have never been) an officer or employee of any of the Corporate Defendants.

5. I have not entered into any contracts with any of the plaintiffs.

6. I have not had any direct communications with any of the plaintiffs.

7. I am the co-owner of 554 Third Avenue, Unit PHA, New York, New York 10016 (the "Apartment") as a tenant in common with Xueyuan Han. The Apartment is my primary residence.

8. Copies of papers related to this litigation were left with the doorman of the building in which I live. The papers have never been delivered directly to me, nor have I received copies of any papers relating to this litigation in the mail or in any way other than being left with the

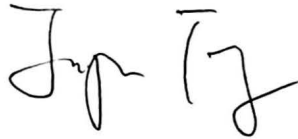
doorman of the building.

I declare, under penalty of perjury that the foregoing is true and correct.
Executed on March __, 2021

Junjun Feng

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1" = "1" " 9812816.2" "" 9812816.2

A handwritten signature in black ink, appearing to read 'Junjun Feng' in a stylized cursive script.

03/17/21